

## REMARKS

In accordance with the foregoing, claims have been neither amended nor canceled. Claims 1-19 are pending and under consideration.

### **REJECTION UNDER 35 U.S.C. §103:**

Claims 1, 3-6, 8-11, 13-16, and 18-19 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Kondoh et al. (U.S. Patent Publication No. 2001/0056377) in view of Moore et al. (U.S. Patent No. 6,330,575) and further in view of Brohoff (U.S. Patent No. 6,108,533).

In response to applicant's argument in response to the Office Action on October 19, 2006, the Examiner asserts that Brohoff discloses providing a customer with information about the location of a particular store within a shopping mall based on a search done by the customer.

By way of review, Brohoff's disclosure is directly related to **how to reach a location**. Whereas, the present invention is directly related to the cyber agency shopping mall a customer does not need to find the actual location for visiting. Furthermore, Brohoff is not related to **cyber mall shopping system** but is merely related to a **shopping mall**, not **cyber shopping mall** and provides a current location using a geographical database. There is no teaching or suggestion of how to combine the features as recited in claims 1, and 3, 8, 13 and 18-19.

The Office Action sets forth that Moore et al. teaches the use of a payment server, i.e. a transaction server in a distributed environment (multiple stores utilizing the same transaction server) (cols. 4-9). Moore et al. teaches that it is complex and expensive to set up an e-commerce server, including that the initial cost is a significant barrier for most small businesses, including the cost of software design and implementation, hardware investment capable of running all three elements of an electronic commerce server for one business (hosting the store front, maintenance of an inventory and financial database and roll out of a secured Transition Server); keeping the storefront/catalog up-to-date, providing the ability to easily create, modify and update its own storefront; the requirement to automatically accept secure, electronic forms of payment.(cols 2-3, lines 4-20)

By way of review, even though Moore et al. teaches the use of a payment server it does not teach or suggest "a payment server that receives the product order information form the shopping mall web server and, after receiving the payment information from the customer web browser through the internet, handles the payment information for the order." as recited in claim 1.

The Office Action acknowledges that neither Kondo et al. nor Moore et al. discloses a shopping mall organized according to geographic information of the plurality of agencies or stores. However, the Examiner takes the position that "Brohoff discloses a geographic database used in a number of different ways and for example in fig. 4, there are illustrated examples of different applications within a shopping mall. The inquiring party is interested in obtaining information from the geographic database concerning the service area. And specific information will be given as to identifying any one of the establishments and how to reach that particular establishment, i.e. the location within the shopping mall where the establishment is located."

By way of review, Brohoff sets forth "Referring next to FIG. 5, there is shown an illustrative macrosystem within which the geographic database of the present invention is implemented. In this example, the size of each of the cells 61, 62 and 63 is relatively large and each covers multiple geographic zones defined within the database. Thus, because of the size and the application, the neighboring zone concept is applied to the retrieval of information from within the database. The inquiring mobile station 19 within the originating geographic area 34a is shown as the central point of inquiry and the location about which geographic information is supplied to the database."(col. 6, lines 27-37). Further, Brohoff is directly related to radio telecommunication systems. Therefore, the information provided to a subscriber is based on a mobile station where the subscriber is located.

In contrast, the present application is directly related to an integrated internet shopping mall management system providing an agency product information received from the agency web browsers corresponding to respective cyber agency shopping malls to the customer web browser organized according to geographic information of the respective plurality of agencies. In addition, Brohoff is directly related to a geographical information system based on a location of the mobile station, rather than a cyber shopping mall management system not restricted to a location of a user. As such, Brohoff fails to disclose "a shopping mall web server that forms a cyber agency shopping mall for each of a plurality of agencies, provides the agency product information received from the agency web browsers corresponding to respective cyber agency shopping malls to the customer web browser organized according to geographic information of the respective plurality of agencies" as recited in claim 1.

Accordingly, it is respectfully submitted that the combination of Kondoh et al., Moore et al. and Brohoff does not disclose or suggest the invention recited in claim 1.

Regarding claim 3, the Office Action sets forth that Kondoh et al. discloses a plurality of cyber agency web servers corresponding to a plurality of offline agencies, that after receiving the agency product information from the agency connecting unit, provide the information to a

connected customer web browser (Fig. 2—step 112;[0047-00048];claim 5)). But the Office Action acknowledges that Kondoh et al. fails to disclose a payment server. However the Examiner sets forth that Moore et al. teaches the use of a payment server, i.e. a transaction server in a distributed environment (multiple stores utilizing the same transaction server). Furthermore, the Office Action alleges that “Brohoff is used in combination with other references to disclose a geographic database that contains geographic information about an organization, agency or shop within the mall and customer can browse the Internet to retrieve information about the location, product information.”

By way of review, Kondoh et al. discloses “when the customer instructs a display of the shopping street in step 112, the shop name list is displayed. A display process of the shop name list panel will now be described. The shop name list panel is a picture in which shop name information (FIG. 5) of the opening shop to be stored in the shop management DB 81 is compounded to a mall background panel (FIG. 4) stored in the mall information DB 9. The shop name list panel is displayed on the input/output device 11 of the customer client 1, thereby setting the screen into a state in which the customer can select the shop where he intends to purchase the goods through the input/output device 11 (paragraph[0089],[0090]) but fails to disclose whether a plurality of cyber agency web servers corresponding to a plurality of offline agencies, that after receiving the agency product information from the agency connecting unit, provide the information to a connected customer web browser” as recited in claim 3(emphasis added).

In addition, Brohoff merely discloses “the present invention includes accessing information within a geographical database associated with a radio telecommunications system serving mobile stations moving over a geographic area.”(col. 2, line 65- col. 3. line 2). Accordingly, the information in Brohoff is limited to a location of a service area which is different from the claim 3 recitation “geographic information for display according to a geographic input received from a connected customer web browser.”

As such, it is respectfully submitted that the combination of Kondoh et al., Moore et al., and Brohoff does not disclose or suggest the invention recited in claim 3.

Regarding claim 4, the Office Action sets forth that Kondoh et al. teaches a cyber agency connecting unit having at least one hyper link corresponding to at least one web page provided by the plurality of cyber agency web servers, and that connects one of the cyber agency web servers decided by selection information received from the customer web browser, to the customer web browsers.

By way of review, Kondoh et al. discloses the relevant shop information is retrieved with reference to the shop layout DB. Further, the relevant goods information is displayed and the

shop information and goods information are formed and transferred to a requesting source (paragraph [0030]). As noted above, in Kondoh et al., relevant information is retrieved from a goods DB but not from a hyper link. As such, Kondoh et al. fails to disclose “a cyber agency connecting unit having at least one hyper link corresponding to at least one web page provided by the plurality of cyber agency web servers, and that connects one of the cyber agency web servers decided by selection information received from the customer web browser, to the customer web browser” as recited in claim 4.

As such, it is respectfully submitted that the combination of Kondoh et al., Moore et al. and Brohoff does not disclose or suggest the invention recited in claim 4.

In addition, claim 5 is deemed patentable due at least to its depending from claim 3, as well as for the additional features recited therein.

Regarding claim 8, the Office Action acknowledges that neither Kondoh et al. nor Moore et al. discloses a shopping mall organized according to geographic information of the plurality of agencies of stores but Brohoff discloses a geographic database used in a number of different ways of and for example in fig. 4, there is illustrated examples of different applications within shopping mall.

By way of review, Brohoff discloses the specific information provided by the geographic database with respect to each of these hits may include geographic information on how to get to each of the locations. As noted above, Brohoff invention is not related to the internet shopping mall management method of claim 8 but only teaches how to find the location of a shopping mall but not how to handle a cyber shopping mall using geographic information of the agencies.

Therefore, Brohoff fails to teach or suggest “providing, on request of a customer web browser, an organization of the agencies according to geographic information of the agencies and from which the customer selects in order to select the agency, and providing agency product information of the selected agency to the customer web browser through an Internet” as recited in claim 8 (emphasis supplied). As such, it is respectfully submitted that the combination of Kondoh et al., Moore et al. and Brohoff does not disclose or suggest the invention recited in claim 8.

Claims 9, and 10 are deemed patentable due at least to their depending from claim 8, as well as for the additional features recited therein.

In addition, claims 13-16, and 18-19 are also submitted to be allowable for at least similar reasons as claim 8, as well as for the additional recitations therein.

Claims 2, 7, and 12 are rejected under U.S.C. 103(a) as being unpatentable over Kondoh et al. in view of Moore et al. as applied to claims 1, 3, and 8 above, and further in view of Brohoff (U.S. Patent No. 6,108,533).

The Office Action acknowledges that neither Kondoh et al. nor Moor et al. teaches that the plurality of cyber agencies is divided according to regions in which each offline agency is located. However the Office Action sets forth the Brohoff discloses a plurality of cyber agencies such that, when the customer selects one of the regions in a map displayed by the cyber agency connecting unity through the customer web browser, the hyper links of all the cyber agency web servers related to the region are displayed, and the customer is enabled to select the cyber agency web server corresponding to the offline agency the customer wants (fig. 3).

By way of review, Brohoff discloses "Referring next to FIG. 3, there is shown a pictorial diagram illustrating the concept of geographic areas and zones and showing one possible interrelationships between zones in the organization of the geographic database of the present invention. Each of the zones 35a-35e are related to one another, respectively, by concentrically surrounding one another. They are shown as being generally circular but other shapes and configurations are possible. The originating geographic area 34a is depicted as being at the center of the concentrically related zones 35a-35e. The interrelationship of the respective zones 35a-35e are shown along a scale 43 which represents relative distance of the respective zones from the originating geographic area 34a and which may also represent the requested order of presentation of information to the inquiring party from the database. The information from the database associated with the zone from which the inquiry originated is presented first. That is, since the inquiry originated from geographic area 34a which lies within the first zone 35a, information within the database that is associated with zone 35a is first presented. Thereafter, information associated with each of the other geographic areas 35b-35e are presented in a sequential and orderly fashion as belonging to the next most proximately related neighboring zones to the originating zone 35a. So also, each neighboring zone may also have neighbors and each such neighboring zone is dealt with until the system is satisfied that there are no more zones left to handle in order to present all of the information required to respond to the inquiry received by the database."(col. 5, lines 20-47, see Fig. 3)

As noted above, Brohoff discloses many different area zones but fails to disclose hyper links of all the cyber agency web servers having the displayed hyper links. Therefore, Brohoff fails to teach or suggest "hyper links of all the cyber agency web servers related to the selected one region are displayed, and the customer selects one of the cyber agency web servers having the displayed hyper links corresponding to the desired offline agency." as recited in claim 2.

As such, it is respectfully submitted that the combination of Kondoh et al., Moore et al. and Brohoff does not disclose or suggest the invention recited in claim 2.

In addition, claims 7 and 12 are also submitted to be allowable for at least similar reasons as claim 2, as well as for the additional recitations therein.

**CONCLUSION:**

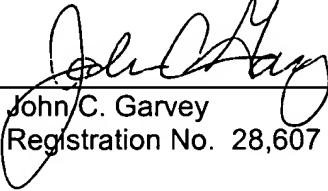
There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,  
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